

III. WRITTEN COMMENTS AND RESPONSES - PUBLIC

Comments on Card Club - EIR - Sites other than D

1. Land use Plans and Policies

A. A-1:

There is no mention made here of the fact that building a parking lot over occupied graves poisons the spot for many Asians who believe that Feng Shui dictates the total loss of luck or good energy in the proximity of a cemetery. AA1
According to Feng Shui, actually having to walk over bodies makes the site so unlucky as to make it unfit for any kind of gaming.

B. Page I-3, A.B.C.2-

In this section the location of Site B is said to be within 50' of the cemetery, yet on page IV, A-14 they state that Salem Memorial Park is as near as 20'. The difference between 50' and 20' is significant relative to Feng Shui considerations, why not use 20' as the measure in both places in the EIR as the more proximate cemetery location is the most relevant one. AA2

C. Table E.1-#3 in the summary ratings table ignores the 55 foot tower contemplated for Site C, despite the fact that it would sit below the cemetery, be well lit and clearly obvious above any landscaping. AA3

D. C-3 in the Land Use Policy Table IV-A.2-summary
The summary gives sites A,B & C a not significant (NS) classification relative to the question of "Conflict with adjacent cemeteries," while giving Site D a significant to less than significant impact classification. This in direct contradiction to page IVA-19 where the EIR states clearly and accurately that "the closest cemetery to Site D is located across Collins Ave to the south. Access to the area would be extremely difficult because the cemetery is located up a fairly steep slope from Collins Ave." AA4

In fact Site D is the only site that is not adjacent to any cemetery, a fact which the EIR seems to selectively ignore.

In truth in this case Site D, far from having an impact, is the only site that clearly has no impact on any cemetery.

2. Hydrology

A. page IV-C-14, Summary Table IV-C-1

It is irresponsible and unfair to make statements about potential to pollute water supplies without making some effort to determine the likelihood of such pollution. Specifically with reference to the San Francisco Water AA5

Department pipes on Site D. A call to the San Francisco Water Department would have been sufficient to discover the depth of the pipe and with that discovery to determine the level of risk involved in development on Site D. Without that knowledge no one can fairly say what the risk of water pollution really is.

3. Biological Resource Impacts

A significant inconsistency, already discussed above. Table IV-D.2 suggests that Site D would have significant to less significant impact on natural communities while input on pg. IV. D-12 says very clearly and decisively that "there are no natural communities on Site D."

AA6

It would be hard to impact a natural community where none exists.

4. Aesthetic Impacts

A. There is no previous discussion of any scenic view available from Site D. Yet it is stated in Summary Table IV E-21 that a club on Site D might obstruct a scenic view. What view? For whom?

AA7

B. Page IV E-21 section E.C1 states quite clearly that "at Site C, under one alternative, the proposed cardroom would include a 55-foot tower that would exceed the current height restriction of 40 feet, resulting in a structure that would be out of scale in the context of adjacent developments and potentially causing view obstruction. This impact would be significant." Yet in Table IV E-1 which summarize aesthetic impacts Site C is given an NS (no significant impact) rating with reference to the category which addresses whether or not the project "would exceed building height restrictions and appear out of scale relative to adjacent developments."

AA8

5. Cultural Resources

The discussion of Feng Shui makes quite clear the polar opposition of Yin and Yang. The EIR points out that an example of Yin is a cemetery and an example of Yang is a casino. The EIR does not point out that putting a casino on or adjacent to a cemetery is the worst kind of placement possible. Those who believe in Feng Shui believe that a cemetery is the worst kind of bad luck. Putting a card room on or adjacent to a cemetery dramatically decreases the likelihood of players finding luck at that location.

AA9

It is important, therefore, to note that sites A, B, and C are either on or adjacent to cemetery lands. Site D is the only site not on or adjacent to cemetery land. Since the EIR acknowledges the importance of Feng Shui to Asian players, it should also acknowledge:

a. That site A, B, and C being located on or adjacent to cemetery land, or actually having parking built over graves makes those sites extremely undesirable relative to Feng Shui. **AA10**

b. That Site D is clearly the best situated site relative to Feng Shui. There is no question that it is the most attractive site for Asian players. **AA11**

6. The examples cited here represent a sampling of the inconsistencies and ambiguities that occur throughout this report. Often impacts are denied on one page and raised on another. In many cases similar situations give rise to dissimilar impact evaluations. It is often unclear why an impact is stated or noted at all. **AA12**

We thank you for your time and attention.

COLMA CLUB

Response

- AA1. Refer to the third paragraph on page IV.H.5 of the DEIR. This paragraph includes a discussion of feng shui and its relationship to the proposed project, and the distance of the nearest burial plots to sites A, B, and C.
- AA2. Two separate references are made to burial plots that are in proximity of Site B. The nearest Home of Peace Cemetery burial plots are 50 south of the project site, and those of Salem Memorial Park are as near as 20 feet to the proposed employee parking lot. Cardroom activities would occur continuously over a 24-hour period, and would be more likely to disturb visitors that are 50 feet south of the project site. Employee parking lot activities would occur only during employee shift changes, and would be less intensive than cardroom activities. Impact A.B.2 is based on the proximity of the project site to the 50 foot burial plots, as visitors to these burial plots are much more likely to be disrupted during a cemetery visit.
- AA3. Comment noted. On the following page is the revised Table IV.E.1 on page IV.E.25 of the DEIR (old text is ~~lined through~~, new text is double underlined).
- AA4. The commentor is correct. Table IV.A.2 on page IV.A.20 of the DEIR has been revised (old text is ~~lined through~~, new text is double underlined). The revised table is provided on page III-7.
- AA5. The conclusion regarding the potential for construction activities at Site D to contaminate a public water supply was made based on the location of a water supply line on the site. It is not unreasonable to conclude that rupture could occur during construction unless crews are notified of its existence. During design of the project, the depth of the pipeline would be determined.
- AA6. Under Impact D.D - 1 it should be stated that, although there are no natural communities on site, there is potential for wetlands on site. A depression runs down the middle of the parcel from north to south, approximately less than half an acre, and contains blackberry bushes (*Rubus ursinus*(= *vitifolius*)), and two willow trees (*Salix* sp.). These species are considered wetland indicator species, species which usually occur in wetlands, but are

TABLE IV.E.1: SUMMARY OF AESTHETICS IMPACTS AND SIGNIFICANCE/a/

<u>IMPACT</u>	<u>SITE A</u>	<u>SITE B</u>	<u>SITE C</u>	<u>SITE D</u>
The project would generate new or additional light and glare to adjacent properties.	S/LS	S/LS	S/LS	S/LS
The project would obstruct scenic views.	NA	S/LS	<u>NSS/LS</u>	<u>S/LSNS</u>
The project would exceed building height restrictions and appear out-of-scale relative to adjacent developments.	NS	NS	<u>S/LSNS</u>	NS
The project would encroach on significant tree masses in a designated scenic corridor.	NS	NS	NS	S/LS

No change
Should stay the same
change

LEGEND

S = Significant Impact
 NS = Not a Significant Impact
 B = Beneficial Impact
 LS = Less than Significant Impact

/a/ For significant impacts, the level of significance following mitigation is indicated next to the impact designation. For example S/LS indicates that the impact would be significant, but is reduced to a less than significant level following mitigation.

SOURCE: Environmental Science Associates, 1993

occasionally found in non-wetlands. Other species related to wetland situations and are present on site are plantain (*Plantago* sp.) and bermuda grass (*Cynodon dactylon*). In lieu of the consultant conducting a wetland delineation to determine if there are characteristic wetland soils, hydrology and plants, it is suggested that the proponent send a letter of notification to the U.S. Army Corps of Engineers to notify them that wetlands do not occur on site. Because the area in question is less than half an acre it is not expected to be involved in the Corps permit process. Only the Corps can determine if that is correct or if the proponent needs to conduct a wetland delineation.

TABLE IV.A.2: SUMMARY OF LAND USE IMPACTS AND SIGNIFICANCE /a/

<u>IMPACT</u>	<u>SITE A</u>	<u>SITE B</u>	<u>SITE C</u>	<u>SITE D</u>
Development of the project would alter the present land use.	S/LS	S/LS	NS	S/LS
Development of the project could conflict with the use of the adjacent cemeteries <u>adjacent land uses</u> .	NS	NS	NS	S/LS
Development of the project would increase the potential for vandalism of adjacent cemeteries.	S/LS	S/LS	NS	NS
Development of the project would be consistent with the existing land use and zoning designations.	S/LS	NS	NS	NS

Changes
tableLEGEND

S = Significant Impact

NS = Not a Significant Impact

B = Beneficial Impact

LS = Less than Significant Impact

/a/ For significant impacts, the level of significance following mitigation is indicated next to the impact designation. For example S/LS indicates that the impact would be significant, but is reduced to a less than significant level following mitigation.

SOURCE: Environmental Science Associates, 1993

AA7. Comment noted. Table IV.E.1 has been revised as indicated on page III-6.

AA8. The conclusion to building height restriction in Table IV.E.1 on page IV.E-25 of the DEIR is changed to read S/LS.

AA9. Feng Shui is not a precise science, and the existence of oppositional forces in close proximity does not in and of itself make a project infeasible. Many factors are

considered by the practitioners of Feng Shui, and mitigations are often developed that offset the impacts of conflicting forces. The EIR authors are not experts at Feng Shui and therefore do not make absolute conclusions regarding the placement of structures, such as a casino in proximity to a cemetery. The EIR notes that Sites A, B & C are proximate to existing burial plots while Site D is not adjacent to any burial plots.

AA10. See Response to Comment AA9.

AA11. See Response to Comment AA10.

AA12. Each impact section of the EIR is preceded by a description of the significance criteria. These criteria are the basis for determining the impacts to the environment that could result from implementation of the project and their level of significance.



RESPONSE TO EIR ON SITE D

I. Land Use

The only residence anywhere near Site D is scheduled for demolition in 1995. Despite that fact, the owners of Site D will make sure that it is shielded by appropriate landscaping from any light or other impact. Appropriate landscaping will be part of the final plan.

BB1

It is important to note that site D is the only site that is not on or adjacent to cemetery land.

It is also important to note that its the only site not near any neighborhood or concentrated residential area.

II. Geology and Soil

The owners of the Colma Club will certainly build a seismically safe, carefully planned building that is up to code. While the likelihood of a ruptured waterline is miniscule, the Card Club will be constructed at an elevation more than sufficient to prevent flooding that might occur as a result of a natural or man made disaster.

BB2

III. Hydrology

The owners of the Colma Club will provide vegetated buffer strips, downslope run-off sources, proper detention ponds with appropriate sediment, grease and pollutant traps, adequate recharge areas and natural vegetation adequate to allow for filtration, drainage and recharge.

BB3

The owners of the Colma Club, realizing the unique nature of their site relative to water pipelines will carefully ascertain pipe depths and monitor work crews and work progress to guarantee that there is no possibility of work related rupture.

IV. Biological Resource Impacts

The EIR states very clearly and categorically that: "There are no natural communities on Site D. There would therefore be no significant impacts to natural communities from development of the site." (page IV. D-11, under impact D.1)

BB4

Since there are no natural communities on Site, any discussion of impacts on natural communities at Site D must be erroneous. Therefore, we hope that reference thereto will be removed before the EIR is certified.

The owners of Site D have already entered into a development agreement with the City of Colma. This agreement (resolution 91-15, 3/13/91) lays out very clearly the developers obligations with reference to this site. That agreement is appended here. Special note should be taken of page 4 which speaks to trees and vegetation on site.

As to the issue of "potential jurisdictional wetlands," it is important to note that the EIR does not actually take a position on whether or not there are any wetlands to be found at site D. It is unclear why the EIR even mentions wetlands in connection with Site D. Never the less the owners of Site D will take appropriate steps to mitigate wetland concerns if any. **BB5**

The owners see the natural landscaping, especially the trees as significant design assets to the site. Especially valuable are the willows at the north end of Site D-1 as well as the pine and cypress which would be incorporated into the parking lot design and retained. The owners of Site D would happily work with Colma to develop a mitigation plan for replacement of any trees that might be removed on a one to one basis either elsewhere on site or within the Town of Colma. **BB6**

- V. Aesthetic Impacts - Encroachment on Significant Tree Masses
The owners of Site D have already executed a development agreement with the Town of Colma as mentioned above. All appropriate precautions were taken relative to this site in that agreement. The owners of Site D intend to continue in that spirit. **BB7**

Relative to other concerns: Landscaping would screen glare, lights would be hooded, exterior paint would be muted or not reflective, visible pylons would not be illuminated and there would be no flashing or blinking lights on the cardroom. **BB8**

- VI. Transportation
The owners of the Colma Club would certainly follow the suggestions in the EIR relative to signalization, hours of banquet operation, shuttle service and notification of employees relative to shuttle availability. **BB9**

The owners also note, however, that Side D is the only site that does not sit on a major artery. The Colma Club would be the only facility open for business on Collins Ave after 6:00 P.M. It is important here, also, to note that Collins Ave unlike Hillside Blvd, Serramonte Blvd or El Camino Real will not be affected by BART construction or station traffic. **BB10**

It is important also to realize that the peak hours of operation for cardrooms are between 6 P.M. and 1 A.M. Friday through Sunday. These are very different from the peak hours used to calculate traffic congestion in the EIR. Those hours were Tuesday and Thursday 7:45 A.M. to 8:45 A.M. and 4:45 P.M. to 5:45 P.M. Common sense alone, to say nothing of research tells us that 7:45 A.M. to 9:45 A.M. are not exactly peak hours for card playing in any venue. While major arteries like Serramonte Blvd, El Camino Real and Hillside Blvd are busy with traffic well into the night, what little traffic there is on Collins Ave all but disappears after 5 P.M.

BB11

COLMA CLUB

Response

- BB1. The land use discussion for Site D on page IV.A.6 of the DEIR notes that a single-family home is located across Collins Avenue, south of the project site. The commentor is correct in stating that Site D is not near any residential area. Regarding the scheduled destruction of the single-family home, the following sentence is added to the second paragraph on page IV.A.6 of the DEIR (old text is ~~lined through~~, new text is double underlined):

"Uses south of the site, across Collins Avenue, are a plumbing supply store, a single-family home, and a bank. The single-family home is scheduled for demolition in 1995 (McLennan, et. al., 1994). Two vacant lots are located east of the site. The parcel immediately east of the cardroom site is approved for a 34-bedroom Senior Care Facility."

The following reference is added to page IV.A-21 of the DEIR:

"McLennan, James M. et. al., JM McLennan Group, letter to the Town of Colma, January 19, 1994."

- BB2. The intent of the Colma Card Club owners is acknowledged. This comment does not directly address the adequacy of the EIR. No further response is required.
- BB3. Regarding the potential for rupturing the underground waterline, the commentor appears to state measures that would be undertaken to prevent this occurrence, or to mitigate the flooding impact if this did occur. The commentor does not address the impact of disrupting a public water supply. The commentor also seems to confuse these impacts relating to potential rupture of the waterline with those involving water pollution. The discussion of various potential surface water pollutants arising from construction practices, from the cardroom building and from vehicles parking there is not addressed by the commentor, although it appears from Comment BB3 that steps would be taken to reduce the impact of surface water pollution to a less-than-significant level.
- BB4. Please refer to comment AA6.

III. Written Comments and Responses - Public

- BB5. A wetland delineation, to determine the potential amount of Corps jurisdictional wetlands that occur on site, was not conducted by the consultant. This would be required by the Corp should the site be selected for the project. This delineation is usually conducted prior to a determination set forth by the Corps. Please refer to comment AA6.
- BB6. The trees present on Site D - 1 should be incorporated into the parking area. Trees that are to be removed should be replaced as determined by the City of Colma.
- BB7. Mitigation measure E.D-2 describes the mitigation measures related to minimizing the project's potential encroachment impacts upon significant tree masses near one of Colma's designated gateways and scenic corridors. The applicant had a conditional use permit for the site, but this permit has expired. The applicant therefore does not have a development agreement with the Town at this time.
- BB8. Mitigation measure E.D-1 identifies mitigation measures aimed at minimizing light and glare impacts.
- BB9. The mitigations identified in the EIR relative to these issues will be incorporated into the Colma Club project.
- BB10. While not situated on a major arterial, the Site D proposal would generate traffic that would use major roadways to and from the site. This traffic is analyzed in the DEIR at the 18 study intersections, as is traffic generated by the other alternate site proposals. There are difference in traffic increases at the study intersections among the various proposals as a function of the site locations relative to the intersections. That is, project-generated traffic through an intersection close to a proposed use is higher than through an intersection farther away from the site. However, traffic generated by Site D would mix with, and therefore would be affected by, traffic generated by BART construction and by the BART Station when it is operational, as would the other alternate site proposals.
- BB11. See response to Comment A4.

January 12, 1994

Malcolm C. Carpenter, City Planner
TOWN OF COLMA
1198 El Camino Real
Colma, California 94014

ENVIRONMENTAL SCIENCE ASSOCIATES, INC.
301 Brannan Street, Suite 200
San Francisco, California 94107-1811

Re: Colma Cardroom Project
Environmental Impact Report

Dear Gentilepersons:

We respectfully request your consideration in reviewing the following comments with respect to that data contained on page III-29 of the aforereferenced report; most notably with respect to Lucky Changes and Cypress Club, and to a lesser degree to the Colma Card Club.

The number of employees required by a successful club in California is somewhat fixed by operational demands. This is well demonstrated by the chart within the aforereferenced report. Note the extremely high consistency of the number of employees per table.¹ The average of successful large card clubs in California is 10.3 employees per table (see Chart A).² The highest table utilization large card club in the state is Garden City in San Jose with an average of 18.75 employees per table. A well designed and managed club in Colma will be successful and therefore demand a reasonable ratio of employees per table. We have interpolated a number of 15 employees per table and in this report we will refer to this as "Exceptionally Successful Card Club". Charts A and B contained on the following page demonstrates the rates required.

CC1

¹In addition to the EIR data, we have determined that The Oaks utilizes 10.3 employees per table.

²This figure was supplied by The Oaks Management.

CHART A:

SUCCESSFUL LARGE CARD CLUB
(Average: 10.3 employees per table)

<u>CLUB</u>	<u>EMPLOYEES PER TABLE</u>
Commerce	10.3
Bicycle	10.4
Oaks	10.3

CHART B:

EXCEPTIONALLY SUCCESSFUL CARD CLUB

<u>CLUB</u>	<u>EMPLOYEES PER TABLE</u>
Maximum needs for a Colma location	15

Using the following data for determining the total number of employees in the formula contained in the aforereferenced report for parking spaces per employee, the following charts (C and D) represent the number of employees each of the Colma sites would require if their facilities and service levels were adequate.

CHART C:

SUCCESSFUL EMPLOYEE PARKING SPACES³
(10.3 employees per table)

	Total		No. of	No. of	Avg. of	Avg. of	Max.	
	No. of Employees	No. of	Employees	Employees	Employees	Employees	Parking	
Site	Tables	Per Table	Employees Per Week	Per Day	Busy Day ⁴	Slow Day	Spaces	
A	24	10.3	247	1236	177	194	159	87
B	50	10.3	515	2575	368	405	331	182
C	60	10.3	618	3090	441	486	397	219
D	50	10.3	515	2575	368	405	331	182

↑
BUSIEST
SHIFT

³First the average number of employees per day is found. This is done by multiplying the total employees needed by the five shifts each employee will work in a week. The weekly total of shifts is then divided by seven to find the number of employees that work on an average day. Weekends are always busier than other days. A busy day will use a minimum of 10% more employees than average, while a slow day will use 10% less. To find the maximum employees working at one time, multiply the average number of employees on a busy day by 45%, which is the busiest shift for the day. That answer is also the number of employee parking spaces needed based on the EIR report requirement.

⁴By dividing the number of employees into three shifts; swing 45%, days 37%, and graveyard 18% (standards in the gaming industry), the maximum employees on the busiest shift should be 45% of that day's workers.

CHART D:

EXCEPTIONALLY SUCCESSFUL EMPLOYEE PARKING SPACES⁵
(15 employees per table)

Site	Total No. of Tables	No. of Employees Per Table	No. of Employees Per Week	No. of Employees Per Day	Avg. of Employees Busy Day ⁶	Avg. of Employees Slow Day	Max. Parking Spaces
A	24	15	360	1800	257	283	127
B	50	15	750	3750	536	589	265
C	60	15	900	4500	643	707	318
D	50	15	750	3750	536	589	265

Total parking spaces needed, by E.I.R. formula, for each Colma site are contained in the following Charts E and F.

CHART E:

SUCCESSFUL TOTAL PARKING SPACES (E.I.R. FORMULA)
(10.3 employees per table)

Site	Employee Parking	Employee Parking (25% overlap)	Table Usage Parking ⁷	Restaurant and Bar ⁸	Total	Available w/ off site	Available on-site
A	87	22	184	5	298	350	350
B	182	46	400	50	678	756	502
C	219	55	480	85	839	900	605
D	182	46	400	112	740	647	647

⁵See Footnote 4.

⁶See Footnote 5.

⁷Asian and Hold'Em games normally have more than 8 players per game and make up the majority of the games spread.

⁸See Appendix A

CHART:

EXCEPTIONALLY SUCCESSFUL TOTAL PARKING SPACES
(E.I.R. FORMULA)
(15 employees per table)

<u>Site</u>	<u>Employee Parking</u>	<u>Employee Parking (25% overlap)</u>	<u>Table Usage Parking⁹</u>	<u>Restaurant and Bar¹⁰</u>	<u>Total</u>
A	127	32	184	5	348
B	265	66	400	50	715
C	318	80	480	85	883
D	265	66	400	112	777

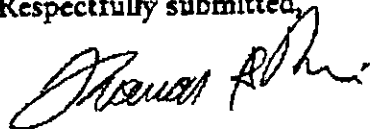
We feel that we have statistically presented the parking and employee demands in the foregoing, and hope that we have demonstrated that the appropriate numbers of employees submitted for preparation of the Environmental Impact Report are not realistic and therefore the parking allotted at these locations need to be reconsidered as to its adequacy.

CC2

Attached hereto are the names and addresses of city officials with respect to the location of each facility in question; together with the names and telephone numbers of the general managers of each facility. We encourage that any questions or inquiries as far as the statistical data presented herein be addressed and/or confirmed to these individuals regarding the needed number of parking spaces and the number of employees.

Thank you for your consideration.

Respectfully submitted,



THOMAS A. PRICE

TAP:dmg

⁹See Footnote 8

¹⁰See Appendix A

APPENDIX A

RESTAURANT & BAR SEATING CAPACITY

(Based on Blueprints)

<u>SITE</u>	<u>SEATING</u>		
A	Snack Bar	10	
	Cocktail	11	
	Banquet	<u>0</u>	
		21	PARKING SPACES 5
B	Restaurant	80	
	Coffee Shop	70	
	Piano Bar/Lounge	50	
	Banquet	<u>0</u>	
		200	PARKING SPACES 50
C	Bar/Lounge	73	
	Coffee Shop	82	
	Restaurant	84	
	Banquet (20-100)	<u>100</u>	
		339	PARKING SPACES 85
D	24-hr. Dining	96	
	Sports Bar	47	
	Snack Bar	5	
	Banquet (up to 300)	<u>300</u>	
		448	PARKING SPACES 112

City of Commerce

City Hall
City Administrator:
Address:

213-722-4805
Louis Shepard
2535 Commerce Way
Commerce, CA 90040

G.M. Ralph Wong
Commerce Club 213-721-2100

Bell Gardens

City Manager:
City Manager:
Address:

310-806-7700
Charles Gomez
7100 Garfield Ave.,
Bell Gardens, CA 90201

G.M. George G. Hardie
Bicycle Club 310-806-4646

Gardena:

City Hall
City Manager:
Address:

310-217-9500
Ken Landau
1700 W. 162nd St.,
Gardena, CA 90247

G.M. Ron Sarakbi
Normandie Club 310-352-3400

San Jose:

City Hall:
City Manager:
Address:

408-277-4000
Les White
801 N. 1st St., #436
San Jose, CA 95110

G.M. John Sutton
Bay 101 408-451-8888

San Jose:

City Hall:
City Manager:
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408-277-4000
Les White
801 N. 1st St., #436
San Jose, CA 95110

G.M. Paul Fontaine
Garden City Club 408-244-3333

San Bruno:

City Hall:
City Manager:
Address:

415-877-8858
Frank Hedley
567 El Camino Real
San Bruno, CA 94066

G.M. Joe Wilson
Artichoke Joe's 415-589-3145

Emeryville:

City Hall:
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510-596-4300
John Flores
2200 Powell Street,
12th Floor
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G.M. John Tibbets
The Oaks 510-653-4456

GOLDEN GATE CASINO

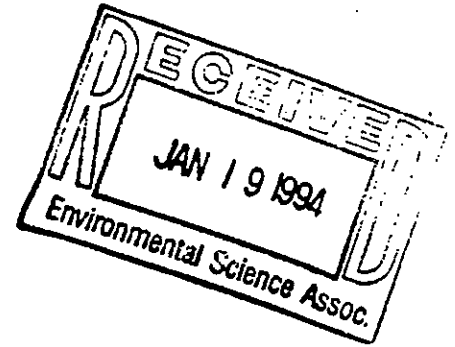
Response

CC1. The information presented in this comment is acknowledged.

CC2. See Response to Comment D3.

Golden Gate Casino, Inc.

January 13, 1994



Mr. Malcolm C. Carpenter
City Planner
Town of Colma
1198 El Camino Real
Colma, CA 94014

Ms. Phyllis Potter
Environmental Science Associates, Inc.
301 Brannan Street, Suite 200
San Francisco, CA 94107

Re: Colma Cardroom Project
Environmental Impact Report

Dear Mr. Carpenter and Ms. Potter:

On behalf of Golden Gate Casino, Inc. we respectfully request for you to consider our comments related to various portions of the draft Environmental Impact Report. In addition, there will be a separate letter addressing our concerns over the parking counts which we have studied and modified for your perusal. Other comments we have regarding the EIR are as follows:

1. Geology and Soils - "Cardroom development would expose people and structures to land sliding. This would be a significant impact." In Mr. Carpenter's synopsis there is a recommendation for our site C to avoid grading during the rainy season, etc. We do not feel there is any impact on our site for the reasons that our site has previously been engineered and developed with existing storm drains, etc. The entire footprint of the gaming facility will not be removed, therefore we feel confident we can continue our construction year round with, of course, the proper prevention - silt fence...., etc. The report itself does not even refer to this specific example as there is no B.C-2 on page I-8. *Maybe they are referring to I-8.* DD1
2. Cultural Resources - As previously discussed, site C is an improved site wherein the excavation, which was significant, has previously been accomplished. There will be no intrusion into the greenbelt area at the rear of the site. We will, of course, follow the recommendations that you require in your mitigation; however, the modification of the existing building will not disturb the site to any significance. DD2.

600 Townsend St. Suite 175 San Francisco Ca. 94103

Mr. Malcolm Carpenter
Ms. Phyllis Potter
Page Two
January 13, 1994

3. Transportation, Circulation and Parking - Regarding I.C-2, there is ample room to add an additional 300 or more parking spaces to our project from land adjacent to the cardroom site. Mr. Price has a long term lease from the Temple Emanu-el on that property. The Temple has acknowledged we have the right to use that site for parking and, furthermore, the specific long term lease does not have any prohibition against that use. We hereby commit to make that parking available for the purpose of making the entire facility usable at all times. Specifically, we have all the required parking to keep the banquet facility operational during peak hours as well as non-peak hours.

DD3

4. Noise

Regarding K.B-1, we find it implausible that this site can be excavated or otherwise re-compacted in such a way as to build a new structure, including structured parking, within a 6-9 month time frame. It is Bill Poland's opinion, who has built over 6 million square feet of commercial real estate projects, that because of soil conditions, drainage engineering and multi-level parking structure, this project will require in excess of one year's construction time.

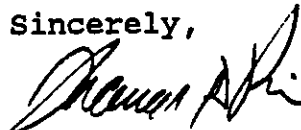
DD4

5. Public Services and Utilities - We certainly intend to comply with the mitigation you suggest. However, in our application we stated that a police sub-station would be developed as part of the project. In addition, we called for a \$300,000 per year project expense to reimburse the City of Colma for the direct cost of on-site law enforcement, including police officers who will be permanently assigned to the cardroom and a financial review officer.

DD5

Thank you for the opportunity to respond to this document which is very thorough in its respect to this new cardroom facility.

Sincerely,



Thomas A. Price

TAP:df

GOLDEN GATE CASINO

Response

- DD1. The commentor appears to be discussing two different impacts and mitigation measures, IV.A.C-3: landsliding, and IV.A.C-4: erosion and siltation. The mitigations limiting grading activities are appropriate for the impact.
- DD2. See response to comment D5.
- DD3. Mitigation Measure I.C-2, page IV.I-34 of the DEIR, states that "[t]he Site C applicant has indicated the ability to expand the parking supply onto land under his control located to the east. If this additional parking is clearly committed to the cardroom project, the projected shortfall would be eliminated [and the impact would be reduced to a less-than-significant level]." (The bracketed phrase was added to the end of the DEIR text to reflect the EIR's statement of impact significance after mitigation.)
- DD4. While construction noise would constitute a temporary, significant impact, mitigation limiting construction activities to the least noise-sensitive times (8:00 a.m. to 5:00 p.m., Monday through Friday) would reduce this impact to a level of insignificance. Because Site B is not located near any residences, it is unlikely that noise generated by construction activities at this site during designated hours, over an extended period of time, would result in a public nuisance. Consequently, extension of the construction period would from 9 months to 12 months would not result in a significant noise impact.
- DD5. The comment generally agrees with terms of Mitigation Measure M.C-1. It is expected that specific details regarding monetary reimbursement to the City of Colma for police expenses related to the project will be worked out at the time one of the projects is approved.

The Congregation Emanu-El
Two Lake Street
San Francisco 94118

(415) 751-2535
FAX (415) 751-2511

January 15, 1994

Frances Liston
Town Manager
Town of Colma
1198 El Camino Real
Colma, CA. 94014

Dear Frances,

We wanted to take this opportunity to comment on the EIR regarding the locations of the card rooms. We do not feel that the EIR properly addresses the impact of traffic at the Collins Ave. location.

EE1

The other locations have entrances on Serramonte or Hillside. These are satisfactory as the entrances are not in close proximity to the cemeteries. The Collins Ave location feeds directly from El Camino and the intersection is at the main entrance to our two cemeteries Home of Peace and Hills of Eternity. (Home of Peace and Hills of Eternity are now under co-management)

EE2

In addition, Collins Ave is a much narrower road as compared to Serramonte and Hillside which will increase traffic congestion. It has been suggested that an entrance off Serramonte would be possible. This also is unacceptable as that part of Serramonte is on a downhill slope and is only two lanes. There is enough cross traffic on that part of Serramonte from Toys "R" Us and the Accura/Saturn dealership.

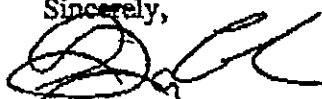
EE3

Though the temple is also planning development along El Camino, the entrance to our cemeteries will always be an important factor in the ultimate development project. A card room a few yards away from the entrance to the cemeteries is not acceptable. When the corner lot at El Camino and Collins across from the bank is developed, the impact of the card room and the corner lot will increase traffic to a greater degree. One mitigation is the installation of a traffic light at the intersection but even this will not address the increased traffic on Collins.

EE4

Thank you for accepting these comments as part of the public record.

Sincerely,


Gary S. Cohn
Executive Director

THE CONGREGATION EMANU-EL

Response

- EE1. The effect of traffic generated by the proposed cardroom at Site D on the intersection of Collins Avenue / El Camino Real is discussed in the DEIR (see Tables IV.I.7 and IV.I.8, pages IV.I-22 and IV.I-23, and page IV.I-35). The impact of the Site D proposal on p.m. peak-hour level of service (LOS) is identified as significant, and mitigation is identified that would reduce the impact to a less-than-significant level.
- EE2. The opinion expressed by the comment is noted. This comment does not directly address the adequacy of the EIR. No response is required.
- EE3. Collins Avenue has two travel lanes (fewer than Serramonte Boulevard [four travel lanes], but the same as Hillside Boulevard). Existing two-way peak-hour traffic volumes on Collins Avenue near El Camino Real are about 210 a.m. vehicles and about 290 p.m. vehicles (see Figure IV.I.2, page IV.I-5 of the DEIR). A comparison to existing peak-hour volumes on the other roads identified in the comment shows that Serramonte, near El Camino Real, has about 560 a.m. vehicles and 1,090 p.m. vehicles, and Hillside, near Serramonte, has about 760 a.m. vehicles and 950 p.m. vehicles. Therefore, Collins Avenue has a lower vehicles-per-lane ratio than the other two roads. Traffic impacts are generally assessed at intersections rather than on roadways because that is where conflicts and resulting congestion tends to occur, but as the relative per-lane volumes presented above indicate, it is expected that the effect of project-generated traffic on Collins Avenue would not be greater than on Serramonte or Hillside Boulevards, and would not be significant. See above response for discussion of EIR-identified significant effects on level of service at the El Camino Real / Collins Avenue intersection.
- EE4. A series of 11 warrants have been established by the Federal Highway Administration, and adopted by Caltrans, to determine whether conditions at an intersection (i.e., volumes, accidents or delays) are, or would be, such that installation of a traffic signal could be justified. The decision to install a signal should not be based solely upon the warrants, however, because the installation of traffic signals can increase certain types of collisions. Peak-hour traffic volumes at the Collins Avenue / El Camino Real intersection do not, and are not projected to, meet minimum volumes needed to satisfy Warrant 11 (Peak-Hour Volume Warrant).